

R & V MOBILE HOME PARK (PWS 3230028) SOURCE WATER ASSESSMENT FINAL REPORT

October 13, 2000



State of Idaho Department of Environmental Quality

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Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the act. This assessment is based on a land use inventory of this designated assessment area, sensitivity factors associated with the wells, and aquifer characteristics.

This report, *Source Water Assessment for R & V Mobile Home Park, Idaho*, describes the public drinking water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within these boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. **The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The R & V Mobile Home Park drinking water system consists of one well. Due to a moderate rating in hydrologic sensitivity and a moderate system construction score, the well ranks at moderate susceptibility to inorganic contamination, volatile organic contamination, synthetic organic contamination, and microbial contamination. Water chemistry tests at the wellhead have detected nitrate between 2 and 3.5 mg/l (Maximum Contaminant Level of 10 mg/l) over the past 7 years. No other types of contaminants have been detected in the well water.

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For the R & V Mobile Home Park, source water protection activities should focus on implementation of practices aimed at reducing the leaching of agricultural chemicals from agricultural land within the designated source water areas. Most of the designated areas are outside the direct jurisdiction of the R & V Mobile Home Park. Partnerships with state and local agencies and industry groups should be established and are critical to success. Continued vigilance in keeping the well protected from surface flooding and keeping the well seal maintained can also keep the potential for contamination reduced. If microbial contamination problems arise, continuous disinfection would reduce the risk of bacteriological contamination. Due to the time involved with the movement of ground water, source water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. Source water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the Gem Soil and Water Conservation District, and the Natural Resources Conservation Service.

A community with a fully-developed source water protection program will incorporate many strategies. For assistance in developing protection strategies please contact the Boise Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

SOURCE WATER ASSESSMENT FOR R & V MOBILE HOME PARK, IDAHO

Section 1. Introduction - Basis for Assessment

The following sections contain information necessary to understand how and why this assessment was conducted. **It is important to review this information to understand what the ranking of this source means.** A map showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are attached. The list of significant potential contaminant source categories and their rankings used to develop this assessment is also attached.

Level of Accuracy and Purpose of the Assessment

The Idaho Department of Environmental Quality (DEQ) is required by the U.S. Environmental Protection Agency (EPA) to assess the over 2,900 public drinking water sources in Idaho for their relative susceptibility to contaminants regulated by the Safe Drinking Water Act. This assessment is based on a land use inventory of the delineated assessment area, sensitivity factors associated with the wells, and aquifer characteristics. All assessments must be completed by May of 2003. The resources and time available to accomplish assessments are limited. Therefore, an in-depth, site-specific investigation to identify each significant potential source of contamination for every public water system is not possible. **Therefore, this assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The ultimate goal of the assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. DEQ recognizes that pollution prevention activities generally require less time and money to implement than treatment of a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a source water protection program should be determined by the local community based on its own needs and limitations. Wellhead or source water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Section 2. Conducting the Assessment

General Description of the Source Water Quality

The R & V Mobile Home Park (MHP), near Emmett, Idaho is a community system serving approximately 31 people with 18 connections. The well is located in Gem County, southeast of the city of Emmett, in the Emmett Valley near the intersection of E. Sales Yard Rd. and David St. (Figure 1). The public drinking water system for R & V MHP is comprised of one well.

The primary water quality issue currently facing the R & V MHP is that of possible nitrate contamination and the problems associated with managing this contamination. Though nitrate has never approached the Maximum Contaminant Level (MCL), significant agricultural land use activities raise the potential for increased contamination. No other significant water chemistry problems have been recorded in the well water, though the possibility of contamination from other agricultural uses remains.

Defining the Zones of Contribution - Delineation

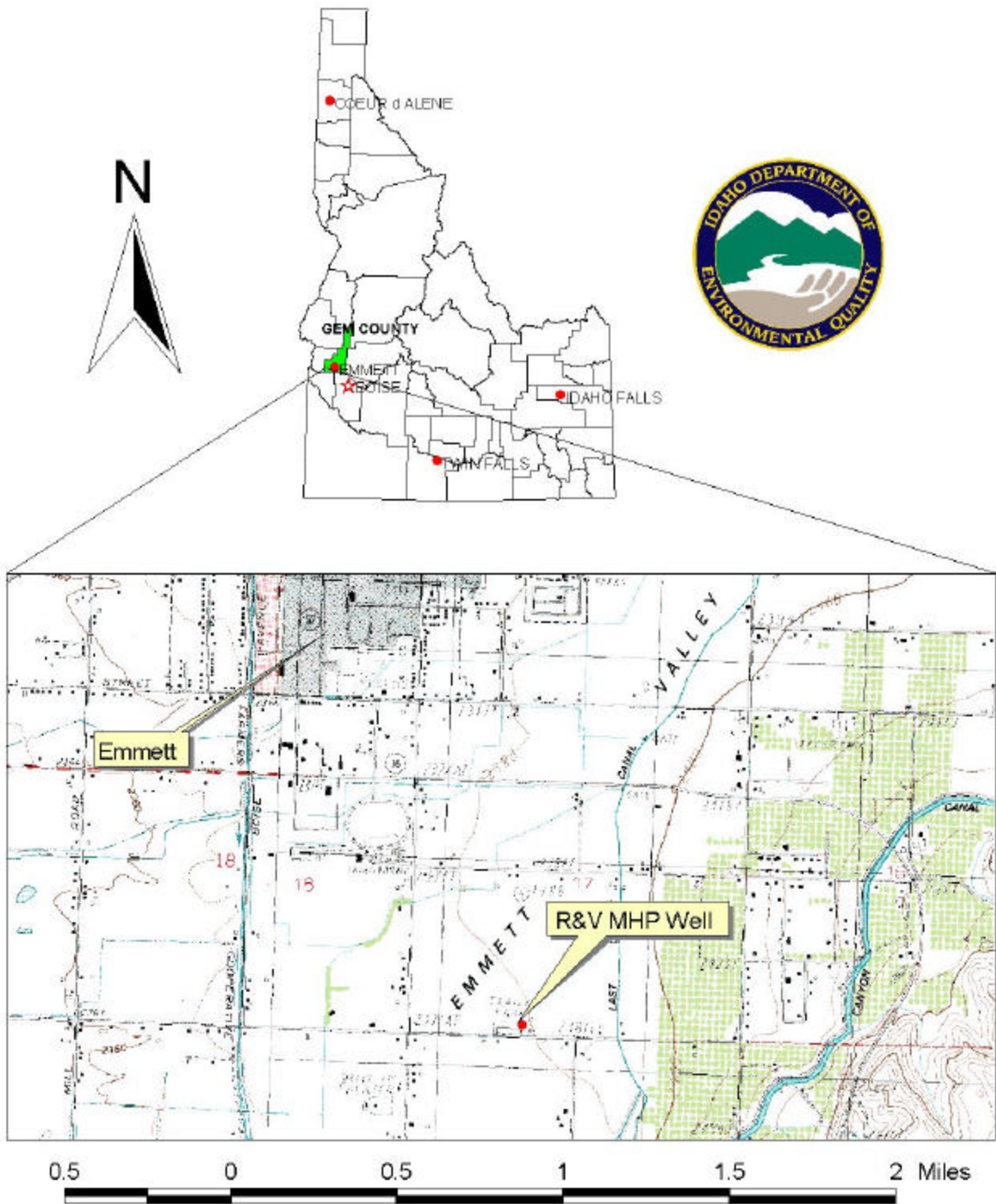
The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time of travel zones (zones indicating the number of years necessary for a particle of water to reach a well) for water in the aquifer. DEQ used a refined computer model approved by the EPA in determining the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) time-of-travel (TOT) for water associated with the Payette Valley aquifer in the vicinity of the R & V MHP. The computer model used site specific data, assimilated by DEQ from a variety of sources including local area well logs. The delineated source water assessment area for R & V MHP can best be described as a corridor ¼ mile wide and 2.5 miles long extending northeast to the Black Canyon Canal. The actual data used by DEQ in determining the source water assessment delineation areas are available upon request.

Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases.

The dominant land use outside the boundaries of the R & V MHP is irrigated cropland. Land use within the immediate area of the wellhead consists of irrigated agriculture and residential uses.

Figure 1. Geographic Location of R&V Mobile Home Park Well



It is important to understand that a release may never occur from a potential source of contamination provided best management practices are used at the facility. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with potential sources of contamination, such as educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted during the summer of 2000. The first phase involved identifying and documenting potential contaminant sources within the R & V MHP Source Water Assessment Area through the use of computer databases and Geographic Information System maps developed by DEQ. The second, or enhanced, phase of the contaminant inventory involved contacting the operator to validate the sources identified in phase one and to add any additional potential sources in the area. This task was undertaken with the assistance of R.G. Quenzer.

Two potential contaminant sites are located within the delineated source water area (see Table 1). The sources include Highway 16 and a general contractor business. Both sites are located in the 6-year time of travel zone (Figure 2).

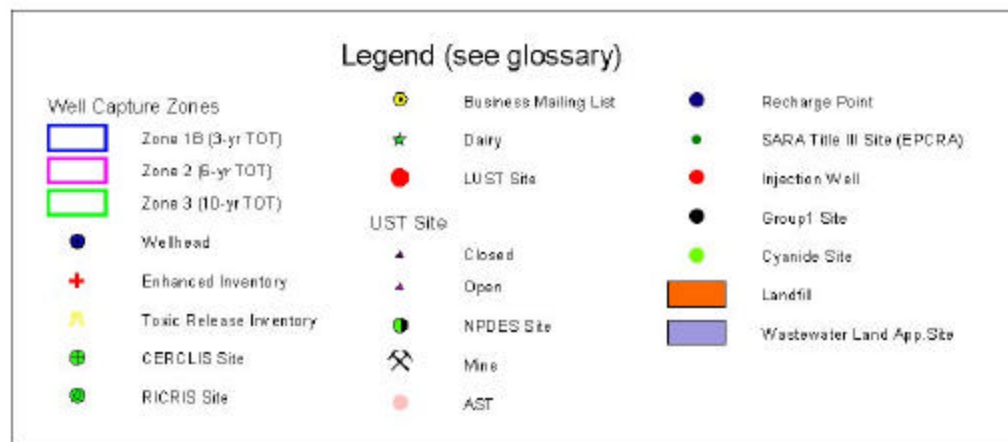
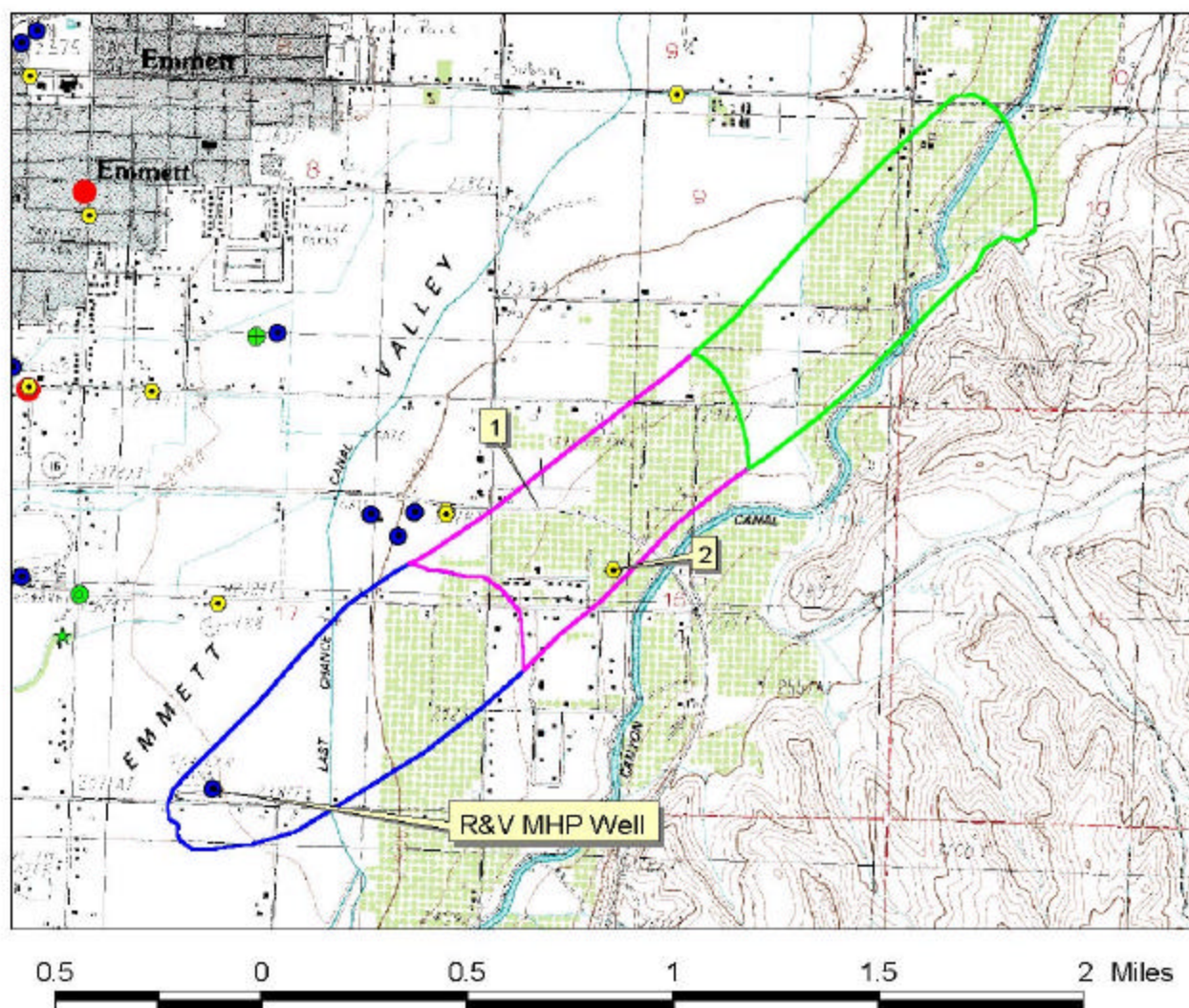
Table 1. R & V MHP, Potential Contaminant Inventory

SITE #	Source Description	TOT Zone ¹ (years)	Source of Information	Potential Contaminants ²
1	Highway 16	3-6	Database Search	IOC, VOC, SOC
2	General Contractor	3-6	Database Search	VOC, SOC

¹ TOT = time of travel (in years) for a potential contaminant to reach the wellhead

² IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Figure 2. R&V MHP Well Delineation and Potential Contaminant Locations



Section 3. Susceptibility Analyses

The water system's susceptibility to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

Hydrologic sensitivity was moderate for the well (see Table 2). This reflects the nature of the soils being in the poorly-drained to moderately-drained class which will retard the downward flow of contaminants. Aspects that raised the score include the lack of information regarding the makeup of the vadose zone (zone from land surface to the water table) or the presence of a low permeability layer that could further retard the movement of contaminants from the surface to the aquifer.

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. The R & V MHP drinking water system consists of one well that extracts ground water for domestic uses. The well system construction score was moderate for the well, based on a 1995 sanitary survey showing compliance with well seal and flood protection standards. No well log was available for the well, so compliance with current Idaho Department of Water Resources standards could not be determined.

The Idaho Department of Water Resources *Well Construction Standards Rules* (1993) require all Public Water Systems (PWSs) to follow DEQ standards as well. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works* (1997) during construction. Table 1 of the *Recommended Standards for Water Works* (1997) states that 8-inch casing requires a thickness of 0.322 inches. Also, in gravel and sand aquifers, the annular seal must extend to at least 20 feet below land surface.

The well in the R & V MHP system is rated to pump 100 gallons per minute. Despite not having a well log, other local wells do not show the presence of the blue clay layer down to 100 feet below ground surface. Without further information, DEQ assumed that the R & V MHP well is completed in the upper, unconfined aquifer.

Potential Contaminant Source and Land Use

The well rated moderate for inorganic chemicals (IOCs) (i.e. nitrates), synthetic organic chemicals (SOCs) (i.e. pesticides), and volatile organic chemicals (VOCs) (i.e. petroleum products). The well rated low for microbial contaminants. Agricultural chemical sources and irrigated agricultural land use in the delineated source area contributed the largest numbers of IOC points to the contaminant inventory rating. IOCs, VOCs,

and SOC's could potentially come from spills on Highway 16, as well as from the general contractor business.

Though the well has shown detection of the IOC nitrate, it has not approached the MCL. No other significant water chemistry problems have been detected at the wellhead.

Final Susceptibility Ranking

A detection above a drinking water standard MCL or a detection of total coliform bacteria or fecal coliform bacteria will automatically give a high susceptibility rating to a well despite the land use of the area because a pathway for contamination already exists. In this case, the well rates moderate for all types of contamination including microbial contamination. The moderate hydrologic sensitivity and the nearby agricultural land uses as well as the lack of information regarding well construction and development predominantly cause these ratings.

Table 2. Summary of R & V MHP Susceptibility Evaluation

Well	Susceptibility Scores ¹									
	Hydrologic Sensitivity	Contaminant Inventory				System Construction	Final Susceptibility Ranking			
		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
1	M	M	M	M	L	M	M	M	M	M

¹H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility

IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Susceptibility Summary

No type of contamination currently threatens the R & V MHP drinking water system. The well showed a moderate susceptibility to IOC (nitrates), VOC, and SOC contamination from local agricultural land uses.

The well in the R & V MHP system probably takes its water from the shallow, unconfined to semi-confined alluvial (river deposited material) aquifer. The shallow aquifer has been demonstrated to be a distinct water-bearing unit in terms of water quality, water yield, and the sources of recharge (DEQ, 2000). Ground water in the shallow aquifer is recharged primarily from surface water irrigation, direct precipitation, and canal leakage.

Section 4. Options for Source Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective source water protection program is tailored to the particular local source water protection area. A community with a fully-developed source water protection program will incorporate many strategies. For R & V MHP, source water protection activities should focus on implementation of practices aimed at reducing the leaching of agricultural chemicals from agricultural land within the delineated source water areas. Most of the delineated areas are outside the direct jurisdiction of R & V MHP. Partnerships with state and local agricultural agencies and industry groups should be established and are critical to success. Continued vigilance in keeping the well protected from surface flooding and keeping an adequate well seal can also keep the potential for contamination reduced. If microbial contamination problems arise, continuous disinfection would reduce the risk of bacteriological contamination. Due to the time involved with the movement of ground water, wellhead protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. Source water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the Gem Soil and Water Conservation District, and the Natural Resources Conservation Service.

Assistance

Public water suppliers and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Boise Regional DEQ Office (208) 373-0550

State DEQ Office (208) 373-0502

Website: <http://www2.state.id.us/deq>

Water suppliers serving few than 10,000 persons may contact John Bokor, Idaho Rural Water Association, at 1-800-962-3257 for assistance with wellhead protection strategies.

POTENTIAL CONTAMINANT INVENTORY

LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as ASuperfund, is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

References Cited

Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 1997. "Recommended Standards for Water Works."

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Idaho Division of Environmental Quality, 1994. Ground Water and Soils Reconnaissance of the Lower Payette Area, Payette County, Idaho. Ground Water Quality Technical Report No. 5. Idaho Division of Environmental Quality. December 1994.

Idaho Division of Environmental Quality, 1996. Lower Payette River Agriculture Irrigation Water Return Study and Ground Water Evaluation, Payette County, Idaho. Water Quality Status Report No. 115.

Idaho Department of Environmental Quality, 1997. Design Standards for Public Drinking Water Systems. IDAPA 58.01.08.550.01.

Idaho Department of Environmental Quality, 2000. City of Fruitland Wellhead Viability Project 319 Grant Final Report July 2000.

Idaho Department of Water Resources, 1993. Administrative Rules of the Idaho Water Resource Board: Well Construction Standards Rules. IDAPA 37.03.09.

Natural Resource Conservation Service, 1991. Idaho Snake-Payette Rivers Hydrologic Unit Plan of Work. March 1991.

United States Geological Survey, 1986. Quality of Ground Water in the Payette River Basin, Idaho. United States Geological Survey. Water Resources Investigation Report 86-4013.

University of Idaho. 1986. Ground Water Resources in a Portion of Payette County, Idaho. Idaho Water Resources Research Institute. University of Idaho. Moscow, Idaho. April 1986.

Attachment A

R & V MHP Susceptibility Analysis Worksheet

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.35)

Final Susceptibility Scoring:

- 0 - 5 Low Susceptibility
- 6 - 12 Moderate Susceptibility
- ≥ 13 High Susceptibility

1. System Construction

SCORE

Drill Date	05/04/1972	
Driller Log Available	NO	
Sanitary Survey (if yes, indicate date of last survey)	YES	1995
Well meets IDWR construction standards	NO	1
Wellhead and surface seal maintained	YES	0
Casing and annular seal extend to low permeability unit	NO	2
Highest production 100 feet below static water level	NO	1
Well located outside the 100 year flood plain	YES	0

Total System Construction Score

4

2. Hydrologic Sensitivity

Soils are poorly to moderately drained	YES	0
Vadose zone composed of gravel, fractured rock or unknown	YES	1
Depth to first water > 300 feet	NO	1
Aquitard present with > 50 feet cumulative thickness	NO	2

Total Hydrologic Score

4

3. Potential Contaminant / Land Use - ZONE 1A

IOC Score	VOC Score	SOC Score	Microbial Score
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Land Use Zone 1A	IRRIGATED CROPLAND	2	2	2	2
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	NO	NO	NO	NO	NO
Total Potential Contaminant Source/Land Use Score - Zone 1A		2	2	2	2

Potential Contaminant / Land Use - ZONE 1B

Contaminant sources present (Number of Sources)	NO	0	0	0	0
(Score = # Sources X 2) 8 Points Maximum		0	0	0	0
Sources of Class II or III leacheable contaminants or 4 Points Maximum	YES	4	0	0	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B Greater Than 50% Irrigated Agricultural Land		4	4	4	4

Total Potential Contaminant Source / Land Use Score - Zone 1B

8 4 4 4

Potential Contaminant / Land Use - ZONE II

Contaminant Sources Present	YES	2	2	2	
Sources of Class II or III leacheable contaminants or	YES	1	0	0	
Land Use Zone II Greater Than 50% Irrigated Agricultural Land		2	2	2	

Potential Contaminant Source / Land Use Score - Zone II

5 4 4 0

Potential Contaminant / Land Use - ZONE III

Contaminant Source Present	NO	0	0	0	
Sources of Class II or III leacheable contaminants or	YES	1	0	0	
Is there irrigated agricultural lands that occupy > 50% of	YES	1	1	1	

Total Potential Contaminant Source / Land Use Score - Zone III	2	1	1	0
Cumulative Potential Contaminant / Land Use Score	17	11	11	6
4. Final Susceptibility Source Score	11	10	10	10
5. Final Well Ranking	Moderate	Moderate	Moderate	Moderate